

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

Chantal Hilton,	)	C.A. No.: 2:24-cv-07719-RMG-MHC
	)	
Plaintiff,	)	
v.	)	
	)	
	)	
Trident Technical College, and Veronica	)	<b>NOTICE OF REMOVAL</b>
Polite,	)	
	)	
Defendants.	)	
_____	)	

TO: The Honorable Judges of the United States District Court for the District of South Carolina

Defendant Trident Technical College (“Trident”) hereby files this Notice of Removal to remove this action from the Court of Common Pleas for the Ninth Judicial Circuit for the State of South Carolina to this Court pursuant to 28 U.S.C. §§ 1331 and 1441(c). In support of this Notice, Trident would show the following:

I.

On November 21, 2024, Plaintiff Chantal Hilton (“Plaintiff”) filed an action in the Court of Common Pleas for the Ninth Judicial Circuit, State of South Carolina, captioned “*Chantal Hilton v. Trident Technical College, and Veronica Polite*” and designated Case No.: 2024-CP-10-05851. On December 12, 2024, Trident accepted service of the Summons and Complaint.<sup>1</sup> A copy of the Summons and Complaint is attached hereto as Exhibit “A.”

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<sup>1</sup> At this time, on information and belief and based upon communications with Plaintiff’s counsel, Plaintiff has not served Defendant Veronica Polite with the Summons and Complaint. Moreover, on information and belief, Defendant Veronica Polite would consent to removal of the case to this Court if served with the Summons and Complaint.

## II.

The action referred to in Paragraph I is a civil action over which this Court has original and removal jurisdiction under 28 U.S.C. § 1331 and 28 U.S.C. § 1441 (a) and (c). Specifically, Plaintiff's Complaint alleges discrimination by Trident in violation of Title VII of the Civil Rights Act and violation of Plaintiff's rights protected pursuant to 42 U.S.C. § 1981.

## III.

This Notice of Removal has been filed within thirty (30) days after the earliest date of service of the Summons and Complaint, and the time for filing this Notice of Removal pursuant to 28 U.S.C. § 1446(b) has not expired.

## IV.

Written notice of the filing of this Notice of Removal will be promptly served on counsel for the Plaintiff.

## V.

A true and correct copy of this Notice of Removal will be filed with the Clerk of Court of Common Pleas for the Ninth Judicial Circuit, State of South Carolina, as provided under 28 U.S.C. § 1446(d).

WHEREFORE, Trident removes this action to this Court's jurisdiction.

s/ Bob J. Conley  
Bob J. Conley (FID #6791)  
CLEVELAND & CONLEY, LLC  
171 Church Street, Suite 310  
Charleston, South Carolina 29401  
Telephone: (843)577-9626  
bconley@clevelandlaborlaw.com

ATTORNEY FOR DEFENDANT  
TRIDENT TECHNICAL COLLEGE

December 31, 2024  
Charleston, South Carolina

**CERTIFICATE OF SERVICE**

This is to certify that I have this date caused to be served a copy of Defendant Trident Technical College's Notice of Removal on counsel for Plaintiff by email and depositing same in the United States Mail, First Class postage prepaid, and addressed to:

Bonnie Travaglio Hunt  
Hunt Law, LLC  
P.O. Box 1845  
Goose Creek, South Carolina 29445  
Telephone: (843) 553-8709  
[bthunt@huntlawllc.com](mailto:bthunt@huntlawllc.com)

s/ Bob J. Conley  
Bob J. Conley (FID #6791)  
CLEVELAND & CONLEY, LLC  
171 Church Street, Suite 310  
Charleston, South Carolina 29401  
Telephone: (843) 577-9626  
Facsimile: (843) 577-6672  
[bconley@clevelandlaborlaw.com](mailto:bconley@clevelandlaborlaw.com)

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